

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America)

v.)

Anndrea Kordel Williams)

Case No. 17-1288-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 18, 2017 in the county of Philadelphia, PA in the
Eastern District of PA & District of N.J., the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. Section 1344

Bank fraud

18 U.S.C. Section 1028A

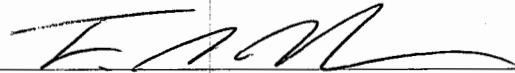
Aggravated identity theft

U.S.C. Section 2

Aiding & abetting

This criminal complaint is based on these facts:

On or about August 18, 2017, defendant ANNDREA KORDEL WILLIAMS knowingly executed, and aided and abetted, a scheme to defraud Citizens Bank, a federally insured bank, in violation of Title 18, United States Code, Sections 1344 and 2, and knowingly committed, and aided and abetted the commission of, aggravated identity theft, in violation of Title 18, United States Code, Sections 1028A and 2.
 See attached Affidavit.

☒ Continued on the attached sheet.


Complainant's signature

T. Sean Norman, Special Agent, FBI

Printed name and title

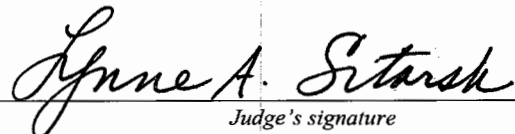
Sworn to before me and signed in my presence.

Date:

September 22, 2017

City and state:

Philadelphia, PA



Judge's signature

HONORABLE LYNNE A. SITARSKI

Printed name and title

AFFIDAVIT

I, T. Sean Norman, being duly sworn, depose and state as follows:

1. I am employed as a Special Agent with the Federal Bureau of Investigation. I have been employed by this agency for eleven years, and I have ten years of experience in the enforcement of identity theft offenses. I am presently assigned to the Philadelphia Field office which investigates financial crimes, among other violations of Federal law.

2. The information within this Affidavit is based upon my personal experience, knowledge and observations, as well as witness interviews, information, records and surveillance photographs supplied to me by Citizen Bank and local law enforcement agencies. What follows is not all of the information I have uncovered during my investigation.

3. Since 2017, the Federal Bureau of Investigation ("FBI") has been investigating an identity theft scheme targeting account holders of Citizens Bank for which account information for the account holders had been illegally obtained from a bank employee.

4. During this investigation, the FBI obtained, from investigators for Citizens Bank, bank records for fraudulent withdrawals from a number of Citizens Bank personal accounts victimized by this scheme and surveillance photographs of "runners," participants in the scheme who went into bank branches and, using fraudulent identification in the names of the account holders, made fraudulent withdrawals from the victims' accounts.

5. I have reviewed Citizens Bank records and surveillance photographs of some of the fraudulent transactions conducted and attempted against the accounts of the victims and an arrest photograph of ANNDREA KORDEL WILLIAMS and I recognize WILLIAMS as

one of the runners in this bank fraud scheme.

6. On or about August 18, 2017, ANNDREA KORDEL WILLIAMS presented, at a Citizens Bank branch in Cherry Hill, New Jersey, fraudulent identification with the name of Citizens Bank account holder B.H., a resident of Coraopolis, Pennsylvania, and attempted to make a fraudulent withdrawal in the amount of approximately \$4,800 against the Citizens Bank account of B.H.

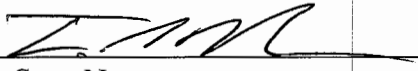
7. WILLIAMS was arrested by Cherry Hill police officers after that attempted fraudulent withdrawals, and admitted that she had been driven to the Cherry Hill Citizens Bank branch from Philadelphia, Pennsylvania by two other persons who provided her with the fraudulent identification in the name of B.H. and instructed her to make the withdrawal from the Citizen Bank account of B.H.

8. Previously, on or about April 28, 2017, another runner in the scheme, Ranin Elgamal, who has been charged elsewhere, made a fraudulent withdrawal in the amount of approximately \$5,000 against the Citizens Bank account of B.H. at a Citizens Bank branch in East Greenwich, Rhode Island, and also made and attempted to make fraudulent withdrawals against the account of another Citizens Bank account holder, A.N., at other Citizens Bank branches in Rhode Island.

9. A former Citizens Bank employee, who had worked at a Citizens Bank branch in Flourtown, Pennsylvania, has admitted to compromising the Citizens Bank account information of a number of Citizens Bank account holders, including B.H. and A.N.

10. At the time of these offenses, Citizens Bank was a federally insured financial institutions doing business in interstate commerce.

11. Based on the above facts, there is probable cause to believe that ANNDREA KORDEL WILLIAMS committed, and aided and abetted, bank fraud and aggravated identity theft, in violation of 18 U.S.C. §§ 1344, 1028A and 2.


T. Sean Norman
Special Agent
Federal Bureau of Investigation

Sworn and Subscribed before me
this 22nd of September, 2017


HONORABLE LYNNE A. SITARSKI
United States Magistrate Judge